

KML Law Group, P.C.
A Professional Corporation incorporated in Pennsylvania
216 Haddon Avenue, Suite 406
Westmont, NJ 08108
(215) 627-1322
Attorneys for Nationstar Mortgage LLC d/b/a Mr. Cooper

IN THE MATTER OF:

Marcus Tse

DEBTOR(S),

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 7
CASE NO. 19-13793 ABA

**NOTICE OF MOTION FOR RELIEF
FROM STAY**

TO:

Marcus Tse
20 Hyacinth Lane
Sicklerville, NJ 08081

Jill T. Bryan
Bryan, Jill T.
Law Office of Jill T. Bryan
Washington Professional Campus,
900 Route 168, Suite A4
Turnersville, NJ 08012

STANGER, DOUGLAS S.
Flaster/Greenberg
646 Ocean Heights Avenue
Linwood, NJ 08221

US TRUSTEE
Office of the US Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

PLEASE TAKE NOTICE THAT the undersigned attorney for **Nationstar Mortgage LLC d/b/a Mr. Cooper**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, N.J. 08101, Courtroom 4B**, for an Order to Grant Relief from the Automatic Stay to authorize the moving parties to prosecute a foreclosure action for the reason that the debtors have failed to maintain their monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. Costs and counsel fees will also be

requested. The property involved is known as **20 Hyacinth Lane, Sicklerville NJ 08081**. The hearing on this matter is scheduled for May 21, 2019 at 10:00 a.m.

/s/ Denise Carlon, Esq.

Denise Carlon, Esquire

Brian C. Nicholas, Esquire

KML Law Group, P.C.

216 Haddon Avenue, Suite 406

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Denise Carlon

Attorney for Nationstar Mortgage LLC d/b/a Mr. Cooper

Dated: April 24, 2019